

AFFIDAVIT IN SUPPORT A CRIMINAL COMPLAINT

I, Heather Blohm, a Special Federal Officer with the Federal Bureau of Investigation (hereinafter “FBI”), Cleveland Division, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in 18 U.S.C § 2516.
2. I have been assigned to the FBI’s Safe Streets Task Force in the FBI’s Cleveland Division, Canton Resident Agency for the last six (6) years. I have been employed by the Medway Drug enforcement Agency for thirteen (13) years. Prior to my current assignment I was assigned as an agent with the Medway Drug Enforcement Agency. As an officer with the FBI’s Safe Streets Task Force, I have been involved in numerous drug trafficking investigations, surveillance, under cover purchases of illegal narcotics, parcel interdictions that resulted in seizures of narcotics and US currency, and drug raids involving the execution of search warrants.
3. This affidavit is being submitted for the limited purpose of establishing probable cause to believe that Soumya Rudra (Rudra), date of birth October XX, 1982, has violated 18 U.S.C. § 2423(b) – Travel with Intent to Engage in Illicit Sexual Conduct and 18 U.S.C. § 2422(b) – Coercion and Enticement of a Minor.
4. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents, Task Force Officers and FBI Analysts, written reports about this and other investigations that I have received directly or indirectly, from other law enforcement agents, information gathered from the results of physical surveillance conducted by law enforcement agents, the service and

execution of administrative subpoenas and federal search warrants, interviewing Hedrick and his associates, independent investigation and analysis by FBI agents/analysts, and my experience, training and background as a Special Agent of the FBI. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause for the requested complaint.

5. On or about November 28, 2023, the undersigned received a call from Captain Charles Ellis from the Wayne County Sheriff's Office requesting assistance in an investigation. Captain Ellis reported that on November 24, 2023, the mother of a juvenile female, M.B. reported that her daughter, B.U. told her she was at a friend's house. However, the mother discovered that her daughter's cell phone was showing her location at the Quality Inn located at 2055 E. Lincoln Way, Wooster in the Northern District of Ohio, Eastern Division. The mother of the juvenile female knew this by using the Life360 application downloaded on her daughter and her cell phones. The mother reported that her daughter was picked up from their residence in a vehicle on November 24, 2023, by a male with dark hair driving a white sedan. Law enforcement attempted to locate the juvenile female at the hotel but were unsuccessful.

6. Deputies then spoke with the friend of the juvenile female. The friend told deputies that the juvenile female was at the Quality Inn with her adult male boyfriend. Deputies located a vehicle in the parking lot that matched the description of the vehicle the mother described as picking up her daughter. Deputies identified a 2021 white Honda Accord as being registered to a Soumya Rudra from Pennsylvania. Deputies observed surveillance video from the hotel and identified the juvenile female and an adult male together, later identified as Soumya Rudra. It was determined that they were in room

207 which was also in the name of Soumya Rudra. Deputies went to room 207 and were met by Rudra. Rudra told deputies that he was in his 40s and he was with a juvenile female who told him she was 16 years old. Rudra was then placed under arrest and advised of his Miranda rights.

7. Deputies then spoke with the juvenile female. The juvenile female stated that she had been talking to Rudra for a few months and confirmed his named started with an S and ended with a Y however she didn't know how to say it. She met him on a dating game app called "Kiss Kiss." She stated she knew he was 41 years old, and she told him she was 15 years old because she will be turning 15 in March. The juvenile female stated she is currently 14 years of age. The juvenile female stated she was dating Rudra and had made plans to meet. Rudra picked her up on the morning of November 24, 2023. They had breakfast and then went back to the hotel where they had sex twice. The juvenile female was transported to Akron Children's hospital for a sexual assault kit to be taken by a SANE certified nurse.

8. Deputies collected Rudra's cellphone, the juvenile female's cellphone, and Rudra's tablet from room 207. They also collected clothing belonging to Rudra and the juvenile female, towels, and two used condoms found in the trash can of their hotel room. Rudra also had packed several unused condoms and "Silbenafil", which is known by the undersigned as being a as generic form of "Viagra."

9. Rudra was transported to the Wayne County Jail. Rudra was read his Miranda warnings and stated that he met the juvenile female through a phone application. Rudra then started talking to her through Snapchat because it was easier than using the phone application. Rudra stated they were dating, had been chatting for a few months, and they communicate mostly through Snapchat text and video calls. Rudra informed investigators that the juvenile female told him she was 16 years of age. Rudra also stated 16 years of age was the legal age in Ohio. Rudra stated he planned to come to Ohio to meet

the juvenile female. Rudra said he drove in the night before and checked in to the hotel on Thanksgiving Day (November 23, 2023). Rudra stated that at 9:00 am the following morning, he picked up the juvenile female up in Shreve, Ohio at an address she provided. Rudra stated they had been planning to meet for approximately a month. Rudra then stated once they got back to the hotel, they had vaginal and oral sex. Rudra stated they had sex one time and when confronted about a second used condom he stated he put it on, "but they did not go all the way."

10. On November 25, 2023, Rudra gave law enforcement consent to search both his cell phone and tablet that were found in the hotel room.

11. The Quality Inn located at 2055 E. Lincoln Way, Wooster, Wayne County, Ohio is located in the Northern District of Ohio, Eastern Division.

CONCLUSION

26. Based on the above information, probable cause exists that Soumya Rudra violated 18 U.S.C. § 2423(b) – Travel with Intent to Engage in Illicit Sexual Conduct and 18 U.S.C. § 2422(b) – Coercion and Enticement of a Minor.

FURTHER AFFIANT SAYETH NOT



Heather Blohm, Task Force Officer
Federal Bureau of Investigation

Sworn to via telephone after submission by reliable electronic means. Fed. R. Crim. P. 3, 4(d), and 4.1, on this 1st day of December, 2023 in Akron, Ohio.





Amanda M. Knapp
United States Magistrate Judge